

EXHIBIT DD

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

JESSE REYES, DANIEL REYNOSO,)
LEAGUE OF UNITED LATIN AMERICAN)
CITIZENS, LATINO COMMUNITY FUND)
OF WASHINGTON,)
)
)No. 4:21-cv-05075-MKD
Plaintiff,)
)
)
)v.
)
)
BRENDA CHILTON, et al.,)
)
)
Defendants.)

ZOOM DEPOSITION UPON ORAL EXAMINATION
OF
RON ANDERSON

Thursday, May 25, 2023
12:02 p.m.

Deanna M. Ellis, CCR No. 2511

The Ohio Reporting Company
312 Walnut St, Suite 1600
Cincinnati, OH 45202



Phone: 1-866-800-7031
Fax: 502-584-0119
schedule@yourdepos.com
www.yourdepos.com

1 MR. McCURDY: Same objection.

2 A. I do not. I couldn't confirm how many
3 numbers.

4 Q. Do you know if it's more than one?

5 A. I would assume so.

6 Q. Do you know where the county obtains the
7 signature samples that it compares to the ballot
8 declaration?

9 A. I'm sorry, say that again for the first part.

10 Q. -- contains the signature samples that it
11 compares with the ballot declaration?

12 MR. McCURDY: Object to form. And,
13 Mark, I think the first part got cut off by your audio.
14 I apologize.

15 THE WITNESS: Yeah.

16 MR. TROUTMAN: Okay. Was the objection
17 because it got cut off or do --

18 MR. McCURDY: The objection was because
19 it got cut off.

20 I saw a puzzled look on Deanna's face, as well.

21 Q. Do you know where the county obtains the
22 signature samples that it compares to the ballot
23 declarations?

24 A. Okay, yes. The signature cards that are on --
25 that are on record in the county. That's one of the

1 comparisons that I now about.

2 Q. And when you say the "signature cards," are
3 you referring to the VoteWA System?

4 A. I guess so. You know, I guess, for
5 clarification on all of that and from my aspect, I have
6 very, very terrible signature. I've had to resign,
7 update my signature on file, at least, one time, maybe
8 two times over time just because they didn't match. So
9 I had to update them. And I just scribble. And so
10 that's -- that's one of the things.

11 In fact, on -- I think it was last fall, maybe it
12 was a non-candidate ballot -- it could have been --
13 there was a ballot that I didn't have any -- it wasn't
14 any candidates on it. It was just issues. I signed the
15 envelope on the outside, put my address on there. And
16 because I had -- not too long before that had to update
17 my signature on file, I put just a little note on the --
18 on the envelope exterior:

19 Yes, Kathy, this is my signature.

20 And so -- just to clarify that they weren't going
21 to come ask me for it again.

22 Q. Do you know if your ballot was accepted?

23 A. I have no idea.

24 Q. Okay. Did you receive a cure form during that
25 election?

1 A. No.

2 Q. Do you recall anybody else ever writing notes
3 to Kathy Fisher or anybody else?

4 A. No. We -- at least, I did. I'm not -- I was
5 not down there or in the elections office. I stayed
6 away from that on purpose. It's a separate little room
7 that nobody can go into, except for the election staff.
8 And so there was no reason for me to be around there at
9 all.

10 Q. Okay. You mentioned that -- when I was asking
11 about where the signature samples came from, you
12 mentioned the signature cards. And I believe you
13 referred to other please.

14 Do you know any place else you got signature
15 samples to compare to the ballot declaration?

16 A. Not to -- I may have misspoke. But I think
17 the signature registration -- I don't know if it's
18 actually a card or whatever, but it's on file. And
19 that's the only place I really know about.

20 Q. Okay. And when you mentioned you updated your
21 signature a few times, what was the process of doing
22 that for you?

23 A. I had -- I went down to the auditor's office
24 and signed a new card that was going to be put on
25 file -- or a form, I should say. Not a card, but a

1
2 C E R T I F I C A T E
3

STATE OF WASHINGTON)
) ss
COUNTY OF SNOHOMISH)

5
6 I, the undersigned Washington Certified Court
Reporter, pursuant to RCW 5.28.010, authorized to
administer oaths and affirmations in and for the State
7 of Washington, do hereby certify:

8 That the foregoing deposition consisting of
pages 1 through 172 of the testimony of each witness
9 named herein was taken stenographically before me and
reduced to typed format under my direction;

10 I further certify that according to CR 30(e)
the witness was given the opportunity to examine, read
and sign the deposition after same was transcribed,
unless indicated in the record that review was waived;

11 I further certify all objections made at the
time of said examination to my qualifications or manner
12 of taking the deposition or to the conduct of any party
have been noted by me upon each said deposition;

13 I further certify that I am not a relative or
employee of any such attorney or counsel, and that I am
not financially interested in the action or the outcome
14 thereof;

15 I further certify that each witness before
examination was by me duly sworn to testify the truth,
the whole truth, and nothing but the truth;

16 I further certify that the deposition, as
transcribed, is a full, true and correct transcript of
the testimony, including questions and answers, and all
objections, motions, and exceptions of counsel made and
taken at the time of the foregoing examination and was
prepared pursuant to the Washington Administrative Code
308-14-135, the transcript preparation format
guidelines;

17 I further certify that I am sealing the
deposition in an envelope with the title of the above
cause and the name of the witness visible, and I am

1 delivering the same to the appropriate authority;

2 I further advise you that as a matter of firm
3 policy, the Stenographic notes of this transcript will
4 be destroyed three years from the date appearing on the
Certificate unless notice is received otherwise from any
party or counsel hereto on or before said date;

5 IN WITNESS WHEREOF, I have hereunto set my
hand and affixed my official seal this 8th day of June,
2023.

6 

7 _____
8 Deanna M. Ellis, CCR
Washington State Certified
Court Reporter
9 License No. 2511

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25